

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the
Liquidation of Bernard L. Madoff Investment
Securities LLC,

Plaintiff,

v.

LANX BM INVESTMENTS, LLC, THE
LANX FUND II, LP, WOLFSON COUSINS,
LP, AND EDARA PARTNERSHIP,

Defendants.

Adv. Pro. No. 08-01789 (SMB)

SIPA Liquidation

(Substantively Consolidated)

Adv. Pro. No. 10-04384 (SMB)

AMENDED STIPULATION AND ORDER

IT IS HEREBY STIPULATED AND AGREED by and between Plaintiff Irving H. Picard, as trustee (the “Trustee”) for the substantively consolidated liquidation of Bernard Madoff Investment Securities LLC (“BLMIS”) under the Securities Investor Protection Act, 15 U.S.C. §§ 78aaa, *et seq.*, and the estate of Bernard L. Madoff, and Defendants Lanx BM Investments, LLC, The Lanx Fund II, LP, Wolfson Cousins, LP, and Edara Partnership (“Defendants”), by the endorsement of their counsel below, that:

1. Defendants consent to the Trustee’s amendment of his Complaint in this proceeding without need for a formal motion.
2. Undersigned counsel have authority to accept service of an amended complaint on behalf of all the Defendants named above.
3. Except as expressly set forth herein, the parties to this Stipulation reserve all rights and defenses they may have, including any challenge to the sufficiency of the allegations in the Amended Complaint.
4. The Trustee may file and serve an amended complaint in this action by May 8, 2017.
5. Defendants shall file and serve their responses to the amended complaint in this action on or before June 9, 2017.

Dated: April 17, 2017
New York, NY

/s/ Keith R. Murphy
David J. Sheehan
Keith R. Murphy
Maximillian S. Shifrin
BAKER & HOSTETLER LLP
45 Rockefeller Plaza
New York, New York 10111
Telephone: (212) 589-4200
Facsimile: (212) 589-4201

*Attorneys for Irving H. Picard, Trustee for
the Substantively Consolidated SIPA Liquidation of
Bernard L. Madoff Investment Securities LLC and the
estate of Bernard L. Madoff*

/s/ Richard A. Kirby
Richard A. Kirby
Laura K. Clinton
BAKER & MCKENZIE LLP
815 Connecticut Avenue, N.W.
Washington, DC 20006-4078
Telephone: (202) 452-7023
Facsimile: (202) 416-7223

*Attorneys for Defendants Lanx BM Investments, LLC, The
Lanx Fund II, LP, Wolfson Cousins, LP, and Edara Partner*

SO ORDERED.

Dated: April 18, 2017
New York, New York

/s/Stuart M. Bernstein
HONORABLE STUART M. BERNSTEIN
UNITED STATES BANKRUPTCY JUDGE